

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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L & LEUNG LEATHERWARE LIMITED, : CIV. 17-CV-7374 (DAB)  
: :  
Plaintiff, : :  
: :  
-against- : :  
: :  
: :  
COLLECTION XIIX ET AL., : :  
: :  
: :  
Defendants. : :  
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**DECLARATION OF ALAN ETKIN**

ALAN ETKIN declares pursuant to 28 U.S.C. §1746 as follows:

1. I am personally familiar with the facts set forth below and respectfully submit this declaration in support of the Motion to Dismiss dated September 13, 2019.
2. I was employed by L & Leung Leatherware Limited for approximately six years and worked directly on the company's behalf.
3. My job for L & Leung was to solicit handbag distributor companies, primarily located in New York and the tri-state area, to use L & Leung as their manufacturer.
4. I worked out of an office space at 320 Fifth Avenue in New York City.
5. I worked with about 6 to 12 customers a year for the six years I worked with L & Leung
6. I was paid a salary directly by wire from L & Leung on a monthly basis for my work.
7. I was employed pursuant to a contract which permitted to work only with L & Leung during his employment.

8. Though L & Leung had final say in terms of pricing, I had authority to negotiate directly with customers on the terms of their orders.

9. Executives of L & Leung, such Andrew Leung and his son, Mark, came to the New York City office approximately once or twice a year to perform business activities on behalf of L & Leung. During these visits, I worked with the Leungs directly regarding the solicitation of and relationships of their customers.

10. At all other times, I engaged in frequent email and phone communications with Mark Leung regarding sales I made for L & Leung.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 13, 2019



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Alan Etkin